

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA)
)
)
vs.) CASE NO. 3:10-00260
) JUDGE WILLIAM J. HAYNES, JR.
MUSSE AHMED ALI)

**MOTION TO PROHIBIT THE GOVERNMENT FROM REFERRING TO THE
DEFENDANTS COLLECTIVELY UNLESS A COMMON FACT APPLIES TO
EVERY DEFENDANT**

Comes now Musse Ahmed Ali, by and through counsel of record, Paul J. Bruno, and hereby respectfully moves this Honorable Court to prohibit the government from referring to the defendants collectively unless a common fact applies to every defendant. Previously, the government and/or witnesses have referred to "the defendants" collectively about certain facts when not all defendants are related to a particular fact or allegation. It will be misleading and confusing to the jury and unduly prejudicial to the defendants if the government does not refer to specific defendants when presenting the proof in this case.

Based upon the foregoing, Mr. Ali respectfully moves to the Court to order the government to refer to specific defendants when presenting proof that does not apply to every defendant.

OPINION
This motion is
DENIED without prejudice to
renew & specific statement
Will J. Haynes
3-22-12